

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
HONORABLE BOARD OF PATENT APPEALS AND INTERFERENCES**

Application of: James G. Shanahan et al.)	Examiner: Laurie Anne Ries
)	
Appl. No.: 09/683,238)	Art Unit: 2176
)	
Filed: 12/05/2001)	Docket No. A1320-US-NP

**Title: META-DOCUMENT MANAGEMENT SYSTEM WITH PERSONALITY
IDENTIFIERS**

Board of Patent Appeals and Interferences
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF IN RESPONSE TO EXAMINER'S ANSWER

Sir:

Appellant respectfully submits this Reply Brief in the appeal of the present case to the Board of Appeals and Patent Interferences in response to the Examiner's Answer mailed December 12, 2007.

I. Response To Examiner's Answer

Each issue on appeal that is discussed below concerns the question whether independent claims 1 (and its dependent claims 3-6, 9, and 10), 11 (and its dependent claims 12-14 and 17-18), and 21 (and its dependent claims 22-26) are unpatentable under 35 U.S.C. §103(a) over Horowitz '987, Horowitz '647, and Reber, where claim 1 is discussed as the representative independent claim.

1. Response To First Issue On Appeal (B.1.a and B.1.b, i.e., Whether The Art Of Record Discloses Or Suggests Recording, With A Reader, Context (Time and Position) Information That Identifies When And Where A Personality Identifier Is Recorded With The Reader)

The Examiner's Answer on page 12, lines 8-10, maintains that contextual information relating to *time* that identifies *when a personality identifier is recorded with a reader* is taught by Reber when taken in combination with Horowitz '987 and Horowitz '647, or more specifically that "time and date information may be reasonably interpreted to be included within the machine-readable bar code included within the header or footer section of the document" disclosed by Reber. Assuming for purpose of discussion that Reber discloses that time and date information may be rendered (or printed) on a network navigation device (in either a human-viewable or machine-readable form) as maintained in the Examiner's Answer, the Examiner's Answer, however, fails to indicate where Reber discloses or suggests recording time information that *identifies* "when [a] personality identifier is recorded with [a] reader", as claimed by Appellant. Instead, the time and date information rendered (or printed) on Reber's disclosed network navigation device sets forth information that identifies *when the network navigation device was created* (e.g., (a) when a network resource provided on the network navigation device was visited or (b) when the network navigation device was produced (see Reber column 15, lines 7-8 and column 16, lines 33-35)).

Further, the Examiner's Answer on page 12, lines 12-13, maintains that contextual information relating to *position* that identifies *where a personality identifier is recorded with a reader* is taught by Reber when taken in combination with Horowitz '987 and Horowitz '647, or more specifically that Reber's network

navigation device has rendered (or printed) thereon machine-readable information that "includes an electronic address [that identifies] the location, or position, of the data". Appellant respectfully submits that the network navigation device disclosed by Reber that is cited in the Examiner's Answer is not directed at recording location information "identifying where [a] personality identifier is recorded with [a] reader" as claimed by Appellant in independent claim 1. Instead, Reber discloses that the position information rendered (or printed) on a network navigation device sets forth information concerning where (a) resources are located or (b) a code is located, from which a node identifies a resource (see Reber column 4, lines 2-7).

Reber, when taken singly or in combination with Horowitz '987 and Horowitz '647, thus fails to disclose or suggest as claimed by Appellant in independent claim 1 recording context information with a reader when a personality identifier is recorded with the reader, which context information includes (1) time information identifying when the personality identifier is recorded with the reader and (2) position information identifying where the personality identifier is recorded with the reader.

2. Response to Second Issue On Appeal (B.2, i.e., Whether The Art Of Record Discloses Or Suggests Identifying Document Content Based On When and Where (i) A Personality Identifier Is Recorded With The Reader And (ii) Document Content Is Accessed With The Reader)

The Examiner's Answer in section B.2, on pages 12-13, maintains that Reber in combination with Horowitz '987 and Horowitz '647 teaches identifying document content based on when and where (i) a personality identifier is recorded with the reader and (ii) document content is accessed with the reader, as claimed by Appellant. Assuming for discussion purposes Reber is interpreted as set forth in section B.2 of the Examiner's Answer (i.e., (a) "information included in the header and footer may include date and time at which the resource was visited or the hard copy output was printed"; (b) "time and date information may be reasonably interpreted to be included within the machine-readable bar code included in the header or footer section of the document"; (c) "machine-readable information includes an electronic address, such as a URL or IP (Internet Protocol) address identifying the location, or position, of the data, and may also be used to identify

servers and information contained therein"; and (d) "information identifying document content, such as instructions for linking resources associated with advertisers"), the Examiner's Answer, however, fails to identify where Reber discloses or suggests as claimed by Appellant in independent claim 1: *identifying document content based when and where* (i) a personality identifier is recorded with the reader and (ii) document content is accessed with the reader.

3. Response To Third Issue On Appeal (B.3, i.e., Whether The Art Of Record Discloses Or Suggests Recording A Personality Identifier With A Reader Together With Context Information)

The issue in the Examiner's Answer in section B.3, on pages 13-14, concerns whether Reber taken together with Horowitz '987 and Horowitz '647 disclose or suggest recording a personality identifier with a reader together with context information, where the personality identifier is associated with a set of document service requests identifying enrichment themes, as recited in Appellant's independent claim 1. Assuming for discussion purposes Reber, Horowitz '987, and Horowitz '647, are interpreted as set forth in section B.3 of the Examiner's Answer (i.e., (a) "using a topic ID, recorded with a dynamic content organization module, which reads the content ... into a database on a computer, and therefore digitally readable, which is associated with a topic, or personality, in a database of topics, or personalities", (b) "a supertopic arrangement containing associated subtopics, which can be used to enrich a document based on the specific supertopic", (c) "annotating entities in the identified document content related to the associated supertopic", and (d) "providing information identifying document content, such as instructions for linking resources associated with the advertiser"), the Examiner's Answer, however, fails to discloses or suggests Appellant's claimed limitation of *recording context information to identify document content with a reader when a personality identifier is recorded with a reader for enriching the identified document content with a personality identified by the personality identifier*.

Instead Reber concerns the rendering (or printing) of machine readable data on a network navigation device (see Appellant's Appeal Brief, section VII.A.3), which once read, the machine readable data may be used to access a network resource.

Thus, using the network navigation device, disclosed by Reber, in combination with the method for creating contextual hyperlinks, disclosed by Horowitz '987 (see Appellant's Appeal Brief, section VII.A.1), and/or the information retrieval system, disclosed by Horowitz '647 (see Appellant's Appeal Brief, section VII.A.2), fails to disclose or suggest Appellant's claimed invention recited in independent claim 1 that includes recording a personality identifier and context information (as discussed in section 1 above) with a reader to enrich document content identified using the recorded context information (as discussed in section 2 above) by recognizing and annotating entities in the identified document content using a set of document service requests identifying enrichment themes that are defined by the personality associated with the personality identifier.

II. Conclusion

Based on the arguments presented in Appellant's Appeal Brief and this Reply Brief, Appellant asserts that claims 1, 3-6, 9, 11-14, 16-18, and 21-26 are in condition for allowance. Appellant therefore urges the Board of Patent Appeals and Interferences to reverse the Examiner's final rejection of claims 1, 3-6, 9, 11-14, 16-18, and 21-26.

Respectfully submitted,

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